

August 2, 1984

TO: Memo to File

FROM: Thomas N. Tetting, Geologist

RE: Brief Inspection of Ziegler Chemical Company Operations

On July 22, 1984 Tom Tetting from the Division drove through the Little Bonanza area which is the general office location of Ziegler Chemical Company. Photos were taken of the area. For all appearances, the sites observed were an absolute mess. A large area, about one acre in size was littered with paper, garbage and trash which was blowing around. A haphazard array of roads connected various assorted storage areas. Accelerated erosion may be occurring. Gilsonite mining equipment and the mineral itself is also scattered about everywhere. The area of concern covered at least five acres for this site alone.

A brief check of all Ziegler files indicates the following:

1. The Ute-32 Mine, ACT/047/008, has not received final approval and no surety is posted.
2. The I-4, E-5 and 8-A Mines, ACT/047/013, have not been fully reviewed, and no approval given nor surety filed.
3. The Weaver Mine Act/047/012 is in a similar state and has not been inspected since 1978.
4. The status of DOE/047/004, DOE/047/012 and DOE/047/015 is unknown.

Based upon the permitting policy which has been instituted for the American Gilsonite Company, ACT/047/010, it is suggested that all Ziegler facilities and mines be treated as one operation pursuant to the statutory definition of "On-site", Section 40-8-4 (8). It reads;

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8. "On-site" means the surface land area within which mining operations are or will be conducted under a notice of intention to commence mining operations and which is bounded by continuous property lines defining surface land ownership, control, or right that is vested in the operator. A series of related properties under the control of a single operator but separated by small parcels of land controlled by others will be considered a site unless excepted by the division.

The current operation may be a blatant violation of objectives of the Act and is a highly unfair, hypocritical situation when compared to the nearly completed permitting undergone by Chevron's American Gilsonite operation.

TNT/jvb

cc: Jim Smith, DOGM

D. Wayne Hedberg, DOGM

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